

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

THE COLEMAN COMPANY, INC.,

*Plaintiff/Counterclaim Defendant,*

V.

TEAM WORLDWIDE CORPORATION,

*Defendant/Counterclaim Plaintiff,*

and

CHENG-CHUNG WANG,

*Counterclaim Plaintiff.*

[illegible]

Civil Action No. 2:20-cv-351-RGD

## JURY TRIAL DEMANDED

**DEFENDANT/COUNTERCLAIM PLAINTIFF TEAM WORLDWIDE**  
**CORPORATION'S RESPONSE TO ORDER REGARDING BIFURCATION**

On February 4, 2022, the Court ordered the parties to provide any objections or comments to bifurcating the liability/defense and damages phases of the pending trial. *See* ECF No. 233. Team Worldwide Corporation (“TWW”) does not object to the Court’s proposal for bifurcation in this matter. The pending trial will include patents asserted by both sides, and TWW’s asserted patent is prior art to Coleman’s asserted patent. As such, the potential for juror confusion regarding the damages asserted by each party is high. TWW agrees that the Court’s proposed bifurcation in this particular matter may increase juror focus by minimizing the issues presented to the jury in each trial phase. Here, bifurcation may also promote efficiency should certain damages issues not require adjudication following the liability phase.

Dated: February 18, 2022

Respectfully submitted,

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*Attorneys for Team Worldwide Corporation  
and Cheng-Chung Wang*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing on February 18, 2022 with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all registered users.

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